

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1-09-07161 RNO  
THREE ARROWS ENTERPRISES, :  
INC., :  
Debtor : Chapter 7

APPLICATION TO EMPLOY ATTORNEY

TO THE HONORABLE ROBERT N. OPEL, BANKRUPTCY JUDGE:

The application of Lawrence G. Frank respectfully  
represents:

1. On the 22<sup>nd</sup> day of January, 2010, applicant was  
appointed trustee in the above matter. At the first meeting of  
creditors held herein on March 19, 2010, no different trustee was  
elected and the applicant became permanent trustee under the  
provisions of the Bankruptcy Code.

2. Applicant wishes to employ Lawrence G. Frank, Esquire,  
as of the date of his appointment as trustee, as an attorney duly  
admitted to practice in this Court. Applicant has selected  
Lawrence G. Frank, Esquire, for the reason that Lawrence G. Frank  
has had considerable experience in bankruptcy matters, and  
applicant believes that Lawrence G. Frank is well qualified to  
represent him in this proceeding. Under Section 327(d) of the  
Bankruptcy Code, the trustee may act as attorney for the estate  
if it is in the best interest of the estate for him to do so.

3. The professional services that Lawrence G. Frank, Esq.,

is to render are, among others, the following:

(a) to assist the trustee in protecting the interest of creditors in a lawsuit that has been filed in Delaware County wherein the debtor is one of the plaintiffs;

(b) to assist the trustee in any action necessary to void any and all transfers which may have been made during the preference or fraudulent transfer period of the Bankruptcy Code, if necessary;

(c) to review claims to determine their validity;

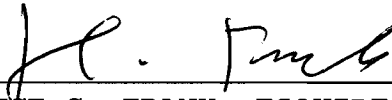
(d) to handle any and all legal problems which may arise during the course of the administration of the estate.

4. The proposed billing rate for the attorney for the trustee will be \$330.00 an hour plus costs for services rendered during calendar year 2010.

5. To the best of applicant's knowledge, Lawrence G. Frank, Esq., has no connection with the debtor, its creditors or any other party in interest, and represents no interest adverse to the trustee of the estate in matters upon which he is to be engaged, and his employment would be in the best interest of the estate.

WHEREFORE, applicant prays that he be authorized to employ  
Lawrence G. Frank, Esq., as his attorney under a general  
retainer.

RESPECTFULLY SUBMITTED BY:

A handwritten signature in black ink, appearing to read 'L. G. Frank', is written over a horizontal line.

LAWRENCE G. FRANK, ESQUIRE  
Thomas, Long, Niesen & Kennard  
P O BOX 9500  
212 Locust St., Suite 500  
HARRISBURG, PA 17108-9500  
(717) 234-7455  
TRUSTEE IN BANKRUPTCY

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1-09-07161 RNO  
THREE ARROWS ENTERPRISES, :  
INC., :  
Debtor : Chapter 7

AFFIDAVIT OF PROPOSED ATTORNEY

Commonwealth of Pennsylvania :  
: SS.  
County of Dauphin :

I, Lawrence G. Frank, Esquire, hereby make solemn oath:

1. I am an attorney and counselor-at-law duly admitted to practice in the Commonwealth of Pennsylvania and in the United States Bankruptcy Court for the Middle District of Pennsylvania.

2. I maintain an office for the practice of law at Thomas, Long, Niesen and Kennard, P O BOX 9500, 212 Locust Street, Suite 500, Harrisburg, PA 17108-9500.

3. I have no connection with Three Arrows Enterprises, Inc., the above named debtor, its creditors or any party in interest herein, or their respective attorneys.

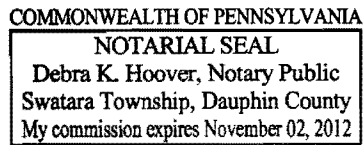
4. I represent no interest adverse to the debtor or its estate in the matters upon which I am to be engaged.

5. I am a disinterested person within Section 101(14) of  
the Bankruptcy Code.

Sworn to and subscribed  
before me this 23<sup>rd</sup> day  
of March, 2010.

Debra K. Hoover  
Notary Public

Lawrence G. Frank  
Lawrence G. Frank, Esq.



CERTIFICATE OF SERVICE

AND NOW, this <sup>4<sup>th</sup></sup> day of March, 2010, I, Debra K.

Hoover, hereby certify that I this day electronically filed the foregoing Application to Employ Attorney with the Clerk of the Bankruptcy Court by using the CM/ECF system which sent notification of such filing to the following filing user at the following e-mail address:

U.S. Trustee-ustpreregion03.ha.ecf@usdoj.gov

Debra K. Hoover  
LAW OFFICES OF  
LAWRENCE G. FRANK, ESQUIRE  
TRUSTEE IN BANKRUPTCY  
THOMAS, LONG, NIESEN AND KENNARD  
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